

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION**

SHEMICKA TAYLOR,

Plaintiff,

v.

CASE NO. 0:24-CV-62347-MD

ALS EDUCATION, INC.,

Defendant.

_____ /

**DEFENDANT’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant, ALS EDUCATION, INC. (hereinafter “Defendant”), by and through its undersigned counsel, hereby moves without opposition for a two-week extension of time, up to and including January 24, 2025, to respond to the Complaint filed by Plaintiff, SHEMICKA TAYLOR (“Plaintiff”). As grounds for this Motion, Defendant states the following:

1. Plaintiff filed the Complaint on December 13, 2024. (ECF No. 1.)
2. Defendant was served on December 20, 2024. (ECF No. 4-1).
3. Thus, according to Federal Rule of Civil Procedure 13(A)(i), Defendant’s response to the Complaint is currently due on January 10, 2025.
4. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Court may extend deadlines for good cause – including the deadline for filing of pleadings responsive to the complaint.

5. Undersigned counsel was retained on January 9, 2025.

6. As such, undersigned counsel needs additional time to investigate Plaintiff's claims and prepare an appropriate responsive pleading in accordance with counsel's obligations under Federal Rule of Civil Procedure 11(b).

7. Accordingly, Defendant respectfully requests that the Court extend the deadline for its response to the Complaint for two weeks, up to and including January 24, 2025.

8. Prior to filing this motion, the undersigned conferred with Plaintiff's counsel and Plaintiff's counsel advised that Plaintiff does not oppose the requested extension of time to respond to the Complaint.

9. This Motion is made in good faith and is not interposed for the purpose of delay. No party will be prejudiced by the requested extension, nor will this case be unduly delayed.

MEMORANDUM OF LAW

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, the Court may, for good cause, enlarge the time for completing an act if a request is made before the time for performance expires. In the instant case, this request that the Court enlarge the time for Defendant's response to Plaintiff's Complaint has been made for good cause. In addition to the authority granted the Court by Rule 6(b)(1), the Court has inherent power to control its docket and grant this extension so that an appropriate response may be made to the Complaint.

WHEREFORE, Defendant, ALS EDUCATION, LLC respectfully requests that the Court enter an Order granting Defendant's Motion and extending the deadline for Defendant to respond to Plaintiff's Complaint up to and including January 24, 2025.

CERTIFICATION OF COMPLIANCE WITH L.R. 7.1

Pursuant to Local Rule 7.1, undersigned counsel for Defendant conferred in good faith with counsel for Plaintiff via telephone on January 9, 2025, and Plaintiff's counsel stated Plaintiff does not oppose this request.

Dated: January 9, 2025.

Respectfully submitted,

/s/ Caren S. Marlowe

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*Attorneys for Defendant ALS
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 9, 2025 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to:

Brian H. Pollock, Esq.
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/s/ Caren S. Marlowe

Attorney